

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
NATALIE K. WIGHT, OSB # 035576
Assistant United States Attorney
natalie.wight@usdoj.gov
1000 SW Third Avenue, Suite 600
Portland, Oregon 97204-2902
Telephone: (503) 727-1000
Facsimile: (503) 727-1117
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:16-cr-00105-AA

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

ROBERT EVANS MAHLER,

Sentencing: October 5, 2020 @ 2:00pm

Defendant.

The United States of America submits the following sentencing memorandum for the Court's consideration. Defendant pleaded guilty to one count of felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1), and the parties jointly recommend a sentence of 3 years of probation.

The offense conduct is accurately outlined in the Presentence Investigation Report in paragraphs 16 – 30. The parties have entered a plea agreement that includes the government’s recommendation for a four-level downward variance pursuant to 18 U.S.C. § 3553 considerations; and the government concurs with the guidelines computation in the PSR as shown below:

Base Offense Level	14
U.S.S.G. § 2K2.1(b)(1) [8-24 firearms]	+4
Adjustment - Acceptance of Responsibility	-3
Total Offense Level	15
18 U.S.C. § 3553 variance	-4
Adjusted Offense Level	11
Criminal History Category	I
Adjusted Guideline Range:	8 -14 months

Based on defendant’s improvement during pretrial supervision, the government joins the defense in recommending a sentence of three years of probation. The U.S. Probation Office also joins in the recommendation. A probationary sentence of three years is sufficient, but not greater than necessary, to comply with the factors set forth in 18 U.S.C. § 3553(a), to include: the nature and seriousness of the offense, defendant’s characteristics and history, the need to provide just punishment and deterrence, promote respect for the law, and the need to protect the public from further crimes committed by defendant.

Dated this 30th day of September 2020.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/ Natalie K. Wight
Natalie K. Wight
Assistant United States Attorney